

1 **JENNY L. FOLEY, Ph.D., ESQ.**
Nevada Bar No. 9017
2 E-mail: jfoley@hkm.com
HKM EMPLOYMENT ATTORNEYS LLP
3 101 Convention Center Drive, Suite 600
Las Vegas, Nevada 89109
4 Tel: (702) 805-8340
Fax: (702) 805-8340
5 *Attorney for Plaintiff*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 SANDRA M. MEZA-PEREZ an Individual,

9 Plaintiff,

10 vs.

11 SBARRO LLC dba SBARRO PIZZA, a
foreign limited liability company, SBARRO
INC., dba SBARRO PIZZA a foreign
12 corporation, ZACHARY CEBALLES, an
individual, EFRAIN HERNANDEZ, an
13 individual, JESUS ALATORRE, an
individual,

14 Defendants.

CASE NO.: 2:19-cv-00373-APG-EJY

**STIPULATION AND ORDER
EXTENDING TIME TO FILE
RESPONSES TO MOTIONS IN
LIMINE**

(SECOND REQUEST)

15 Plaintiff, SANDRA M. MEZA-PEREZ (“Plaintiff”) and Defendants SBARRO LLC
16 dba SBARRO PIZZA, a foreign limited liability company, SBARRO INC., dba SBARRO
17 PIZZA a foreign corporation, and Defendant Zachary Ceballes, by and through their counsel of
18 record, hereby stipulate to extend the deadline to file responses to the Motions in Limine (ECF
19 246, 247, 250).

20 Responses to the Motions in Limine (ECF 246, 247, 250) are currently due on April 4,
21 2022 (ECF 274). While Defendants are prepared to timely file their opposition to the Plaintiff’s
22 Motions in Limine as a matter of professional courtesy, Defendants are in agreement to a mutual
23 extension of time.
24

1 The parties have agreed to extend this date to April 11, 2022.

2 The parties require this extension to give newly appearing counsel for Plaintiff time to
3 obtain the complete file and review the same and respond to the Motions in Limine. As such,
4 the parties stipulate for the extension to finalize and provide the Oppositions to the Court.

5 Accordingly, this extension is made in good faith and not for the purpose of undue
6 delay. This is especially true given the Court's recent rescheduling of trial from the March 28
7 trial stack to the August 22 trial stack, providing the parties and the Court enough time to seek
8 this extension and decide these Motions prior to trial. The parties agree that no further
9 extensions will be requested regarding these Motions in Limine.

10 Dated April 4, 2022

11 /s/ Jenny L. Foley
12 JENNY L. FOLEY, Ph.D., ESQ.
HKM EMPLOYMENT ATTORNEYS LLP
13 HARDEEP SULL, ESQ.
SULL & ASSOCIATES, PLLC
14 Attorneys for Plaintiff

Dated April 4, 2022

/s/Kelsey E. Stegall
PATRICK HICKS, ESQ.
KELSEY E. STEGALL, ESQ.
LITTLER MENDELSON, P.C.
JASON K. HICKS, ESQ.
GREENBERG TRAURIG, LLP

15 Dated April 4, 2022

16 /s/ Patrick N. Chapin
17 PATRICK N. CHAPIN, ESQ.
PATRICK N. CHAPIN, LTD
18 Attorney for Defendant
ZACHARY CEBALLES

Attorneys for Defendants SBARRO, LLC dba
SBARRO PIZZA, SBARRO, INC. dba
SBARRO PIZZA

19
20 **ORDER**

21 IT IS SO ORDERED:

22 
UNITED STATES DISTRICT JUDGE

23 DATED: April 5, 2022
24